

**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
COLUMBIA DIVISION**

Jon Michael Vitale,

Plaintiff,

v.

Mimedx Group, Inc., Parker H. Petit, and  
William C. Taylor,

Defendants.

C/A No.: 3:19-cv-00529-RBH

**PLAINTIFF'S RESPONSES TO LOCAL RULE  
26.01 INTERROGATORIES**

The Plaintiff, by and through his undersigned attorney, hereby answers Local Rule 26.01 (DSC), Interrogatories, as follows:

**(A) State the full name, address and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.**

Answer: None.

**(B) As to each claim, state whether it should be tried jury or non-jury and why.**

Answer: Plaintiff is entitled to have all of his claims tried by a jury except for his claim for unjust enrichment.

**(C) State whether the party submitting these responses is a publicly owned company and separate identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.**

Answer: The Plaintiff is not a publicly-owned company.

**(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).**

Answer: Venue lies within the Columbia Division because Defendant has offices in that division.

**(E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.**

Answer: See *United States of America ex rel. Jon Vitale v. MiMedx Group, Inc.*, C.A. No. 3:17-cv-00166-RBH, currently pending before this Court.

**CROMER BABB PORTER & HICKS, LLC**

BY: s/J. Paul Porter  
J. Paul Porter (#11504)  
1418 Laurel Street, Suite A  
Post Office Box 11675  
Columbia, South Carolina 29211  
Phone 803-799-9530  
Fax 803-799-9533

***Attorneys for Plaintiff***

February 22, 2019  
Columbia, South Carolina